

**IN THE UNITED STATES DISTRICT COURT FOR THE
WESTERN DISTRICT OF MISSOURI
WESTERN DIVISION**

UNITED STATES OF AMERICA,

Plaintiff,

v.

KEILON L. MADGE,
a.k.a. "Kilo,"
[DOB: 02/06/1975],

Defendant.

Case No. _____

COUNT ONE:

21 U.S.C. §§ 841(a)(1), (b)(1)(B) and 846
NLT 5 Years Imprisonment
NMT 40 Years Imprisonment
NMT \$5,000,000 Fine
NLT 4 Years Supervised Release
Class B Felony

COUNTS TWO and THREE:

21 U.S.C. §§ 841(a)(1) and (b)(1)(B)
NLT 5 Years Imprisonment
NMT \$5,000,000 Fine
NLT 4 Years Supervised Release
Class B Felony

\$100 Special assessment per count of
conviction

INDICTMENT

THE GRAND JURY CHARGES THAT:

COUNT ONE

On or between June 29, 2011, and August 3, 2011, said dates being approximate, in the Western District of Missouri, and elsewhere, the defendant **KEILON L. MADGE**, did knowingly and intentionally, combine, conspire, confederate and agree with others both known and unknown to the Grand Jury, to distribute twenty eight (28) grams or more of cocaine base (*i.e.* "crack"), a Schedule II controlled substance, contrary to the provisions of Title 21, United States Code, Sections 841(a)(1) and (b)(1)(B); contrary to the provisions of Title 21 United States Code, Section 846.

COUNT TWO

On or about July 19, 2011, in the Western District of Missouri, **KEILON L. MADGE**, defendant herein, did knowingly and intentionally distribute twenty eight (28) grams or more of

cocaine base (“crack”), a Schedule II controlled substance, contrary to the provisions of Title 21, United States Code, Sections 841(a)(1) and (b)(1)(B).

COUNT THREE

On or about August 3, 2011, in the Western District of Missouri, **KEILON L. MADGE**, defendant herein, did knowingly and intentionally distribute twenty eight (28) grams or more of cocaine base (“crack”), a Schedule II controlled substance, contrary to the provisions of Title 21, United States Code, Sections 841(a)(1) and (b)(1)(B).

A TRUE BILL.

_____/s/ Laurie A. Payne_____
FOREPERSON OF THE GRAND JURY

_____/s/ Stefan C. Hughes_____
Stefan C. Hughes
Assistant United States Attorney

Dated: __5/25/16_____
Kansas City, Missouri